

Attachment C
Operations & Environmental Compliance Plan
Worksheet

The Department has developed the following questionnaire to assist Silver Track participants in developing an OEC, and to help focus the Department's review of the OEC. If you are using existing documents as part of your OEC, such as a Discharge Prevention, Containment and Countermeasures (DPCC) Plan, please list the title of the document in the Document Title column. If you have not completed your OEC, please list the anticipated completion date for the appropriate sections.

	<u>Yes</u>	<u>No</u>	<u>Completion Date</u>	<u>Document Title</u>
<u>Environmental Policy</u>				
Commitment by Top Management: Is top management committed to developing and maintaining an environmental policy and improving the facility's environmental performance?	_____	_____	_____	_____
Commitment to Continual Improvement: Does the facility's environmental policy include a commitment to continually improve the OEC/EMS?	_____	_____	_____	_____
Commitment to Pollution Prevention: Does the facility's environmental policy include a commitment to pollution prevention activities?	_____	_____	_____	_____
Commitment to Environmental Compliance: Does the facility's environmental policy include a commitment to comply with and excel beyond relevant environmental legislation?	_____	_____	_____	_____
<u>Planning</u>				
Evaluation of Environmental Impacts: Has the facility established procedures to identify the environmental impacts of its operations, products, and services? (The facility should consider these impacts when setting environmental goals and objectives).	_____	_____	_____	_____
Identification of Legal Requirements: Has the facility established procedures to identify any new legal requirements associated with the environmental impacts of its operations, products and services, as well as any modifications to existing legal requirements?	_____	_____	_____	_____

	<u>Yes</u>	<u>No</u>	<u>Completion Date</u>	<u>Document Title</u>
Environmental Objectives and Targets: Has the facility established written environmental objectives and targets that will help it continually improve its environmental performance? (These objectives should be consistent with the facility's environmental policy.)	_____	_____	_____	_____
Environmental Management Program: Does the facility have a program for achieving its environmental objectives and targets that designates responsibilities and establishes a timeline for reaching these goals?	_____	_____	_____	_____
<u>Implementation and Operations</u>				
Resources and Personnel: Is facility management committed to identifying and providing the financial and personnel resources required to fully implement the OEC/EMS?	_____	_____	_____	_____
Clearly Defined Structure and Responsibilities: Does the facility have clearly defined Roles and Responsibilities, for implementing the OEC/EMS?	_____	_____	_____	_____
Has this information been communicated to personnel?	_____	_____	_____	_____
Personnel Training: Does the facility identify training needs and provide training to all personnel whose work may impact the environment?	_____	_____	_____	_____
Does this training include information on the roles and responsibilities for Implementing the OEC/EMS?	_____	_____	_____	_____
Procedures for Communication: Has the facility established procedures for internal communication between various levels and functions of the facility?	_____	_____	_____	_____

	<u>Yes</u>	<u>No</u>	<u>Completion Date</u>	<u>Document Title</u>
Has the facility also established procedures for receiving, documenting and responding to external communications regarding the OEC/EMS and environmental impacts of the facility?	_____	_____	_____	_____
Documentation: Does the facility have documentation in written or electronic form of the core elements of the OEC/EMS and how these elements relate to one another?	_____	_____	_____	_____
Does this include documentation of the facility's community outreach program?	_____	_____	_____	_____
Document Control: Has the facility established procedures to ensure that the OEC/EMS documents can be located and are periodically reviewed, revised, and approved?	_____	_____	_____	_____
Do these procedures also ensure that current versions of relevant documents are available where operations that are part of the OEC/EMS are performed?	_____	_____	_____	_____
Operational Control: Has the facility established operational procedures and controls to ensure that the organization's environmental policy, objectives, and targets are met?	_____	_____	_____	_____
Emergency Preparedness and Response: Has the facility developed emergency preparedness and response procedures?	_____	_____	_____	_____
Do these include procedures for assessing the potential for accidents and emergencies, preventing incidents and their associated environmental impacts, and responding to and mitigating impacts associated with any incidents that do occur?	_____	_____	_____	_____
Does the facility review these procedures and revise them, if necessary, following any accidents or emergency situations?	_____	_____	_____	_____

	<u>Yes</u>	<u>No</u>	<u>Completion Date</u>	<u>Document Title</u>
<u>Checking and Corrective Action</u>				
Monitoring and Measurement: Has the facility established procedures to monitor those activities that impact the environment?	_____	_____	_____	_____
Has the facility also established procedures for evaluating compliance with environmental regulations?	_____	_____	_____	_____
Non-conformance and Corrective Action: Has the facility established procedures for investigating non-conformance with the OEC/EMS, identifying root causes, and undertaking corrective and preventive actions?	_____	_____	_____	_____
Maintenance of Environmental Records: Has the facility established procedures for maintaining environmental records?	_____	_____	_____	_____
Do these records include those required by federal and state regulations, training records, and the results of audits and reviews?	_____	_____	_____	_____
OEC/EMS Audits: Has the facility established procedures for conducting periodic audits to determine whether or not the system meets its stated goals and has been properly implemented and maintained?	_____	_____	_____	_____
Do these procedures also ensure that information from the results of the audit is provided to management?	_____	_____	_____	_____
Management Review: Does the facility have procedures for top management to review the OEC/EMS to ensure its effectiveness and to determine whether any changes are necessary?	_____	_____	_____	_____
Community Outreach: Has the facility implemented a community outreach plan according to the <i>Silver Track Guidance Document</i> ?	_____	_____	_____	_____